

UNITED STATES DISTRICT COURT

for the

Northern District of California

____ Oakland ____ Division

CALIFORNIA COALITION FOR WOMEN
PRISONERS; individuals on behalf of themselves and
all others similarly situated

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v-

UNITED STATES OF AMERICA FEDERAL BUREAU
OF PRISONS, a governmental entity; al.
Officer Pool

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)

Case No.

4:23-cv-04155-YGR

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐

Yes

☒

No

FILED

OCT 04 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE DEFENDANT'S ANSWER TO THE COMPLAINT

I. The Parties Filing This Answer to the Complaint

Provide the information below for each defendant filing this answer or other response to the allegations in the plaintiff's complaint. Attach additional pages if needed.

Name Patrick Pool

Street Address 401 Winchester St.

City and County Vallejo/Solano County

State and Zip Code Ca. 94590

Telephone Number 707-515-8184

E-mail Address ppool44@gmail.com

II. The Answer and Defenses to the Complaint

A. Answering the Claims for Relief

On a separate page or pages, write a short and plain statement of the answer to the allegations in the complaint. Number the paragraphs. The answer should correspond to each paragraph in the complaint, with paragraph 1 of the answer corresponding to paragraph 1 of the complaint, etc. For each paragraph in the complaint, state whether: the defendant admits the allegations in that paragraph; denies the allegations; lacks sufficient knowledge to admit or deny the allegations; or admits certain allegations but denies, or lacks sufficient knowledge to admit or deny, the rest.

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT
OF CALIFORNIA

ADDENDUM DEFENDANT OFFICER POOL ANSWERS TO COMPLAINT

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Section I - Defenses to Introduction Allegations:

1. Lack of Sufficient Knowledge to admit or deny the allegation.
2. Lack of Sufficient Knowledge to admit or deny the allegation.
3. Lack of Sufficient Knowledge to admit or deny the allegation.
4. Lack of Sufficient Knowledge to admit or deny the allegation.
5. Lack of Sufficient Knowledge to admit or deny the allegation.
6. Lack of Sufficient Knowledge to admit or deny the allegation.
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13. Lack of Sufficient Knowledge to admit or deny the allegation.
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25. Lack of Sufficient Knowledge to admit or deny the allegation.
26. Lack of Sufficient Knowledge to admit or deny the allegation.
27. Lack of Sufficient Knowledge to admit or deny the allegation.
28. Lack of Sufficient Knowledge to admit or deny the allegation.

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29. Lack of Sufficient Knowledge to admit or deny the allegation.
30. Lack of Sufficient Knowledge to admit or deny the allegation.
31. Lack of Sufficient Knowledge to admit or deny the allegation.
32. Lack of Sufficient Knowledge to admit or deny the allegation.
33. Lack of Sufficient Knowledge to admit or deny the allegation.
34. Lack of Sufficient Knowledge to admit or deny the allegation.
35. Lack of Sufficient Knowledge to admit or deny the allegation.
36. Lack of Sufficient Knowledge to admit or deny the allegation.
37. Lack of Sufficient Knowledge to admit or deny the allegation.
38. Lack of Sufficient Knowledge to admit or deny the allegation.
39. Deny all Allegations
40. Lack of Sufficient Knowledge to admit or deny the allegation.
41. Lack of Sufficient Knowledge to admit or deny the allegation.
42. Deny all Allegations
43. Deny all Allegations
44. Deny all Allegations

Section II part 1 - Defenses Factual Allegations:

45. Lack of Sufficient Knowledge to admit or deny the allegation.
46. Lack of Sufficient Knowledge to admit or deny the allegation.
47. Lack of Sufficient Knowledge to admit or deny the allegation.
48. Lack of Sufficient Knowledge to admit or deny the allegation.
49. Lack of Sufficient Knowledge to admit or deny the allegation.
50. Lack of Sufficient Knowledge to admit or deny the allegation.
51. Lack of Sufficient Knowledge to admit or deny the allegation.
52. Lack of Sufficient Knowledge to admit or deny the allegation.
53. Lack of Sufficient Knowledge to admit or deny the allegation.
54. Lack of Sufficient Knowledge to admit or deny the allegation.
55. Lack of Sufficient Knowledge to admit or deny the allegation.
56. Lack of Sufficient Knowledge to admit or deny the allegation.

Section II part 2 - Defenses to The BOP Has Failed to Detect, Prevent, and Address Sexual Misconduct by BOP Staff and Failed to Act and Hold Staff Accountable for Decades.

57. Lack of Sufficient Knowledge to admit or deny the allegation.

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58. Lack of Sufficient Knowledge to admit or deny the allegation.
59. Lack of Sufficient Knowledge to admit or deny the allegation.
60. Lack of Sufficient Knowledge to admit or deny the allegation.
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88. Lack of Sufficient Knowledge to admit or deny the allegation.
89. Lack of Sufficient Knowledge to admit or deny the allegation.
90. Lack of Sufficient Knowledge to admit or deny the allegation.

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Section III - The BOP Has Failed to Take Action to Stop Ongoing Sexual Assault and Harassment and to Protect the Individuals in Its Care at FCI Dublin.

91. Lack of Sufficient Knowledge to admit or deny the allegation.
92. Lack of Sufficient Knowledge to admit or deny the allegation.
93. Lack of Sufficient Knowledge to admit or deny the allegation.
94. Lack of Sufficient Knowledge to admit or deny the allegation.
95. Lack of Sufficient Knowledge to admit or deny the allegation.
96. Lack of Sufficient Knowledge to admit or deny the allegation.
97. Lack of Sufficient Knowledge to admit or deny the allegation.
98. Deny all Allegations
99. Lack of Sufficient Knowledge to admit or deny the allegation.
100. Lack of Sufficient Knowledge to admit or deny the allegation.
101. Lack of Sufficient Knowledge to admit or deny the allegation.
102. Lack of Sufficient Knowledge to admit or deny the allegation.
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104. Lack of Sufficient Knowledge to admit or deny the allegation.
105. Lack of Sufficient Knowledge to admit or deny the allegation.
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120. Lack of Sufficient Knowledge to admit or deny the allegation.
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122. Lack of Sufficient Knowledge to admit or deny the allegation.

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- 123. Lack of Sufficient Knowledge to admit or deny the allegation.
- 124. Lack of Sufficient Knowledge to admit or deny the allegation.
- 125. Lack of Sufficient Knowledge to admit or deny the allegation.
- 126. Lack of Sufficient Knowledge to admit or deny the allegation.
- 127. Lack of Sufficient Knowledge to admit or deny the allegation.
- 128. Deny all Allegations
- 129. Lack of Sufficient Knowledge to admit or deny the allegation.
- 130. Lack of Sufficient Knowledge to admit or deny the allegation.
- 131. Lack of Sufficient Knowledge to admit or deny the allegation.
- 132. Deny all Allegations
- 133. Lack of Sufficient Knowledge to admit or deny the allegation.
- 134. Lack of Sufficient Knowledge to admit or deny the allegation.

Section III part B. - Survivors Continue to Face Severe Retaliation for Reporting Abuse, Which Chills Further Reporting and Obstructs Investigations into Abuse.

- 135. Lack of Sufficient Knowledge to admit or deny the allegation.
- 136. Lack of Sufficient Knowledge to admit or deny the allegation.
- 137. Lack of Sufficient Knowledge to admit or deny the allegation.
- 138. Lack of Sufficient Knowledge to admit or deny the allegation.
- 139. Lack of Sufficient Knowledge to admit or deny the allegation.
- 140. Lack of Sufficient Knowledge to admit or deny the allegation.
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- 145. Lack of Sufficient Knowledge to admit or deny the allegation.
- 146. Lack of Sufficient Knowledge to admit or deny the allegation.
- 147. Lack of Sufficient Knowledge to admit or deny the allegation.
- 148. Lack of Sufficient Knowledge to admit or deny the allegation.
- 149. Lack of Sufficient Knowledge to admit or deny the allegation.
- 150. Lack of Sufficient Knowledge to admit or deny the allegation.

Section III part B #2. - Preemptive Retaliation to Prevent Reporting

- 151. Lack of Sufficient Knowledge to admit or deny the allegation.

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- 152. Lack of Sufficient Knowledge to admit or deny the allegation.
- 153. Lack of Sufficient Knowledge to admit or deny the allegation.
- 154. Lack of Sufficient Knowledge to admit or deny the allegation.
- 155. Lack of Sufficient Knowledge to admit or deny the allegation.
- 156. Lack of Sufficient Knowledge to admit or deny the allegation.
- 157. Lack of Sufficient Knowledge to admit or deny the allegation.
- 158. Lack of Sufficient Knowledge to admit or deny the allegation.

Section III part C. - Survivors Have No Way To Confidentially Report Abuse

- 159. Lack of Sufficient Knowledge to admit or deny the allegation.
- 160. Lack of Sufficient Knowledge to admit or deny the allegation.
- 161. Lack of Sufficient Knowledge to admit or deny the allegation.
- 162. Lack of Sufficient Knowledge to admit or deny the allegation.
- 163. Lack of Sufficient Knowledge to admit or deny the allegation.
- 164. Lack of Sufficient Knowledge to admit or deny the allegation.
- 165. Lack of Sufficient Knowledge to admit or deny the allegation.
- 166. Lack of Sufficient Knowledge to admit or deny the allegation.
- 167. Lack of Sufficient Knowledge to admit or deny the allegation.
- 168. Lack of Sufficient Knowledge to admit or deny the allegation.
- 169. Lack of Sufficient Knowledge to admit or deny the allegation.

Section III part D. - Staff Are Not Held Accountable for Abuse

- 170. Lack of Sufficient Knowledge to admit or deny the allegation.
- 171. Lack of Sufficient Knowledge to admit or deny the allegation.
- 172. Lack of Sufficient Knowledge to admit or deny the allegation.
- 173. Lack of Sufficient Knowledge to admit or deny the allegation.
- 174. Lack of Sufficient Knowledge to admit or deny the allegation.
- 175. Lack of Sufficient Knowledge to admit or deny the allegation.
- 176. Lack of Sufficient Knowledge to admit or deny the allegation.
- 177. Lack of Sufficient Knowledge to admit or deny the allegation.
- 178. Lack of Sufficient Knowledge to admit or deny the allegation.
- 179. Lack of Sufficient Knowledge to admit or deny the allegation.
- 180. Lack of Sufficient Knowledge to admit or deny the allegation.

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Section III part E. - Survivors of Sexual Abuse and Retaliation at Dublin Have Experienced Grievous Physical, Mental, Dignitary, and Economic Injuries

181. Lack of Sufficient Knowledge to admit or deny the allegation.
182. Lack of Sufficient Knowledge to admit or deny the allegation.
183. Lack of Sufficient Knowledge to admit or deny the allegation.
184. Lack of Sufficient Knowledge to admit or deny the allegation.
185. Lack of Sufficient Knowledge to admit or deny the allegation.
186. Lack of Sufficient Knowledge to admit or deny the allegation.
187. Lack of Sufficient Knowledge to admit or deny the allegation.
188. Lack of Sufficient Knowledge to admit or deny the allegation.
189. Lack of Sufficient Knowledge to admit or deny the allegation.
190. Lack of Sufficient Knowledge to admit or deny the allegation.

Section III part F. - Survivors of and Witnesses to Sexual Abuse Are Denied Access to Mental Health Care and Medical Care to Address Their Mental and Physical Injuries

191. Lack of Sufficient Knowledge to admit or deny the allegation.
192. Lack of Sufficient Knowledge to admit or deny the allegation.
193. Lack of Sufficient Knowledge to admit or deny the allegation.
194. Lack of Sufficient Knowledge to admit or deny the allegation.
195. Lack of Sufficient Knowledge to admit or deny the allegation.
196. Lack of Sufficient Knowledge to admit or deny the allegation.
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205. Lack of Sufficient Knowledge to admit or deny the allegation.
206. Lack of Sufficient Knowledge to admit or deny the allegation.
207. Lack of Sufficient Knowledge to admit or deny the allegation.

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Section III part G. - Conditions for Sexual Violence Remain at FCI Dublin

- 208. Lack of Sufficient Knowledge to admit or deny the allegation.
- 209. Lack of Sufficient Knowledge to admit or deny the allegation.
- 210. Lack of Sufficient Knowledge to admit or deny the allegation.
- 211. Lack of Sufficient Knowledge to admit or deny the allegation.
- 212. Lack of Sufficient Knowledge to admit or deny the allegation.
- 213. Lack of Sufficient Knowledge to admit or deny the allegation.

Section III part H. - Dublin Officers Established a Trafficking System to Illicit Sexual Acts and Forced Labor from Plaintiffs.

- 214. Lack of Sufficient Knowledge to admit or deny the allegation.
- 215. Lack of Sufficient Knowledge to admit or deny the allegation.
- 216. Lack of Sufficient Knowledge to admit or deny the allegation.
- 217. Lack of Sufficient Knowledge to admit or deny the allegation.
- 218. Lack of Sufficient Knowledge to admit or deny the allegation.
- 219. Lack of Sufficient Knowledge to admit or deny the allegation.
- 220. Lack of Sufficient Knowledge to admit or deny the allegation.
- 221. Lack of Sufficient Knowledge to admit or deny the allegation.
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- 223. Lack of Sufficient Knowledge to admit or deny the allegation.
- 224. Lack of Sufficient Knowledge to admit or deny the allegation.
- 225. Lack of Sufficient Knowledge to admit or deny the allegation.
- 226. Lack of Sufficient Knowledge to admit or deny the allegation.
- 227. Lack of Sufficient Knowledge to admit or deny the allegation.
- 228. Lack of Sufficient Knowledge to admit or deny the allegation.
- 229. Lack of Sufficient Knowledge to admit or deny the allegation.
- 230. Lack of Sufficient Knowledge to admit or deny the allegation.

Class Action Allegations

- 231. Lack of Sufficient Knowledge to admit or deny the allegation.
- 232. Lack of Sufficient Knowledge to admit or deny the allegation.
- 233. Deny all allegations
- 234. Deny all allegations
- 235. Lack of Sufficient Knowledge to admit or deny the allegation.

236. Lack of Sufficient Knowledge to admit or deny the allegation.

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237. Deny all allegations

Claims for Relief

238. Lack of Sufficient Knowledge to admit or deny the allegation.

239. Lack of Sufficient Knowledge to admit or deny the allegation.

240. Deny all allegations

241. Deny all allegations

242. Deny all allegations

Second Claim for Relief

243. Lack of Sufficient Knowledge to admit or deny the allegation.

244. Lack of Sufficient Knowledge to admit or deny the allegation.

245. Deny all allegations

246. Deny all allegations

247. Deny all allegations

Third Claim for Relief

248. Lack of Sufficient Knowledge to admit or deny the allegation.

249. Lack of Sufficient Knowledge to admit or deny the allegation.

250. Deny all allegations

251. Deny all allegations

252. Deny all allegations

Fourth Claim for Relief

253. Lack of Sufficient Knowledge to admit or deny the allegation.

254. Lack of Sufficient Knowledge to admit or deny the allegation.

255. Lack of Sufficient Knowledge to admit or deny the allegation.

256. Lack of Sufficient Knowledge to admit or deny the allegation.

257. Lack of Sufficient Knowledge to admit or deny the allegation.

258. Lack of Sufficient Knowledge to admit or deny the allegation.

Fifth Claim for Relief

259. Lack of Sufficient Knowledge to admit or deny the allegation.

260. Lack of Sufficient Knowledge to admit or deny the allegation.

261. Lack of Sufficient Knowledge to admit or deny the allegation.

262. Lack of Sufficient Knowledge to admit or deny the allegation.

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263. Lack of Sufficient Knowledge to admit or deny the allegation.

Sixth Claim for Relief

264. Deny all allegations

265. Deny all allegations

266. Lack of Sufficient Knowledge to admit or deny the allegation.

267. Deny all allegations

268. Deny all allegations

269. Deny all allegations

270. Deny all allegations

271. Deny all allegations

272. Deny all allegations

273. Deny all allegations

274. Deny all allegations

275. Deny all allegations

276. Deny all allegations

277. Deny all allegations

278. Deny all allegations

279. Deny all allegations

280. Deny all allegations

281. Deny all allegations

282. Deny all allegations

283. Deny all allegations

284. Deny all allegations

Seventh Claim for Relief

285. Lack of Sufficient Knowledge to admit or deny the allegation.

286. Lack of Sufficient Knowledge to admit or deny the allegation.

287. Lack of Sufficient Knowledge to admit or deny the allegation.

288. Lack of Sufficient Knowledge to admit or deny the allegation.

289. Lack of Sufficient Knowledge to admit or deny the allegation.

290. Lack of Sufficient Knowledge to admit or deny the allegation.

291. Lack of Sufficient Knowledge to admit or deny the allegation.

292. Lack of Sufficient Knowledge to admit or deny the allegation.

293. Lack of Sufficient Knowledge to admit or deny the allegation.

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294. Lack of Sufficient Knowledge to admit or deny the allegation.

295. Lack of Sufficient Knowledge to admit or deny the allegation.

Eighth Claim for Relief

296. Lack of Sufficient Knowledge to admit or deny the allegation.

297. Lack of Sufficient Knowledge to admit or deny the allegation.

298. Lack of Sufficient Knowledge to admit or deny the allegation.

299. Lack of Sufficient Knowledge to admit or deny the allegation.

300. Lack of Sufficient Knowledge to admit or deny the allegation.

301. Lack of Sufficient Knowledge to admit or deny the allegation.

Ninth Claim for Relief

302. Lack of Sufficient Knowledge to admit or deny the allegation.

303. Lack of Sufficient Knowledge to admit or deny the allegation.

304. Lack of Sufficient Knowledge to admit or deny the allegation.

305. Lack of Sufficient Knowledge to admit or deny the allegation.

306. Lack of Sufficient Knowledge to admit or deny the allegation.

307. Lack of Sufficient Knowledge to admit or deny the allegation.

308. Lack of Sufficient Knowledge to admit or deny the allegation.

309. Lack of Sufficient Knowledge to admit or deny the allegation.

310. Lack of Sufficient Knowledge to admit or deny the allegation.

311. Lack of Sufficient Knowledge to admit or deny the allegation.

312. Lack of Sufficient Knowledge to admit or deny the allegation.

Tenth Claim for Relief

313. Lack of Sufficient Knowledge to admit or deny the allegation.

314. Lack of Sufficient Knowledge to admit or deny the allegation.

315. Lack of Sufficient Knowledge to admit or deny the allegation.

316. Lack of Sufficient Knowledge to admit or deny the allegation.

317. Lack of Sufficient Knowledge to admit or deny the allegation.

318. Lack of Sufficient Knowledge to admit or deny the allegation.

319. Lack of Sufficient Knowledge to admit or deny the allegation.

320. Lack of Sufficient Knowledge to admit or deny the allegation.

321. Lack of Sufficient Knowledge to admit or deny the allegation.

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Eleventh Claim for Relief

- 322. Lack of Sufficient Knowledge to admit or deny the allegation.
- 323. Lack of Sufficient Knowledge to admit or deny the allegation.
- 324. Lack of Sufficient Knowledge to admit or deny the allegation.
- 325. Lack of Sufficient Knowledge to admit or deny the allegation.
- 326. Lack of Sufficient Knowledge to admit or deny the allegation.
- 327. Lack of Sufficient Knowledge to admit or deny the allegation.

Twelfth Claim for Relief

- 328. Lack of Sufficient Knowledge to admit or deny the allegation.
- 329. Lack of Sufficient Knowledge to admit or deny the allegation.
- 330. Lack of Sufficient Knowledge to admit or deny the allegation.
- 331. Lack of Sufficient Knowledge to admit or deny the allegation.
- 332. Lack of Sufficient Knowledge to admit or deny the allegation.
- 333. Lack of Sufficient Knowledge to admit or deny the allegation.
- 334. Lack of Sufficient Knowledge to admit or deny the allegation.
- 335. Lack of Sufficient Knowledge to admit or deny the allegation.
- 336. Lack of Sufficient Knowledge to admit or deny the allegation.
- 337. Lack of Sufficient Knowledge to admit or deny the allegation.
- 338. Lack of Sufficient Knowledge to admit or deny the allegation.

Thirteenth Claim for Relief

- 339. Lack of Sufficient Knowledge to admit or deny the allegation.
- 340. Lack of Sufficient Knowledge to admit or deny the allegation.
- 341. Lack of Sufficient Knowledge to admit or deny the allegation.
- 342. Lack of Sufficient Knowledge to admit or deny the allegation.
- 343. Lack of Sufficient Knowledge to admit or deny the allegation.
- 344. Lack of Sufficient Knowledge to admit or deny the allegation.
- 345. Lack of Sufficient Knowledge to admit or deny the allegation.
- 346. Lack of Sufficient Knowledge to admit or deny the allegation.
- 347. Lack of Sufficient Knowledge to admit or deny the allegation.
- 348. Lack of Sufficient Knowledge to admit or deny the allegation.
- 349. Lack of Sufficient Knowledge to admit or deny the allegation.
- 350. Lack of Sufficient Knowledge to admit or deny the allegation.

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Fourteenth Claim for Relief

- 351. Lack of Sufficient Knowledge to admit or deny the allegation.
- 352. Lack of Sufficient Knowledge to admit or deny the allegation.
- 353. Lack of Sufficient Knowledge to admit or deny the allegation.
- 354. Lack of Sufficient Knowledge to admit or deny the allegation.
- 355. Lack of Sufficient Knowledge to admit or deny the allegation.
- 356. Lack of Sufficient Knowledge to admit or deny the allegation.

Fifteenth Claim for Relief

- 357. Lack of Sufficient Knowledge to admit or deny the allegation.
- 358. Lack of Sufficient Knowledge to admit or deny the allegation.
- 359. Lack of Sufficient Knowledge to admit or deny the allegation.
- 360. Lack of Sufficient Knowledge to admit or deny the allegation.
- 361. Lack of Sufficient Knowledge to admit or deny the allegation.
- 362. Lack of Sufficient Knowledge to admit or deny the allegation.
- 363. Lack of Sufficient Knowledge to admit or deny the allegation.
- 364. Lack of Sufficient Knowledge to admit or deny the allegation.
- 365. Lack of Sufficient Knowledge to admit or deny the allegation.
- 366. Lack of Sufficient Knowledge to admit or deny the allegation.
- 367. Lack of Sufficient Knowledge to admit or deny the allegation.
- 368. Lack of Sufficient Knowledge to admit or deny the allegation.

Sixteenth Claim for Relief

- 369. Lack of Sufficient Knowledge to admit or deny the allegation.
- 370. Lack of Sufficient Knowledge to admit or deny the allegation.
- 371. Lack of Sufficient Knowledge to admit or deny the allegation.
- 372. Lack of Sufficient Knowledge to admit or deny the allegation.
- 373. Lack of Sufficient Knowledge to admit or deny the allegation.
- 374. Lack of Sufficient Knowledge to admit or deny the allegation.
- 375. Lack of Sufficient Knowledge to admit or deny the allegation.
- 376. Lack of Sufficient Knowledge to admit or deny the allegation.
- 377. Lack of Sufficient Knowledge to admit or deny the allegation.

Seventeenth Claim for Relief

- 378. Lack of Sufficient Knowledge to admit or deny the allegation.

379. Lack of Sufficient Knowledge to admit or deny the allegation.

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380. Lack of Sufficient Knowledge to admit or deny the allegation.

381. Lack of Sufficient Knowledge to admit or deny the allegation.

382. Lack of Sufficient Knowledge to admit or deny the allegation.

383. Lack of Sufficient Knowledge to admit or deny the allegation.

Eighteenth Claim for Relief

384. Lack of Sufficient Knowledge to admit or deny the allegation.

385. Lack of Sufficient Knowledge to admit or deny the allegation.

386. Lack of Sufficient Knowledge to admit or deny the allegation.

387. Lack of Sufficient Knowledge to admit or deny the allegation.

388. Lack of Sufficient Knowledge to admit or deny the allegation.

389. Lack of Sufficient Knowledge to admit or deny the allegation.

390. Lack of Sufficient Knowledge to admit or deny the allegation.

391. Lack of Sufficient Knowledge to admit or deny the allegation.

392. Lack of Sufficient Knowledge to admit or deny the allegation.

393. Deny all allegations

394. Deny all allegations

395. Deny all allegations

Nineteenth Claim for Relief

396. Lack of Sufficient Knowledge to admit or deny the allegation.

397. Lack of Sufficient Knowledge to admit or deny the allegation.

398. Lack of Sufficient Knowledge to admit or deny the allegation.

399. Lack of Sufficient Knowledge to admit or deny the allegation.

400. Lack of Sufficient Knowledge to admit or deny the allegation.

401. Lack of Sufficient Knowledge to admit or deny the allegation.

402. Lack of Sufficient Knowledge to admit or deny the allegation.

403. Lack of Sufficient Knowledge to admit or deny the allegation.

404. Lack of Sufficient Knowledge to admit or deny the allegation.

405. Lack of Sufficient Knowledge to admit or deny the allegation.

Twentieth Claim for Relief

406. Deny all allegations

407. Deny all allegations

408. Deny all allegations

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409. Deny all allegations

410. Deny all allegations

411. Deny all allegations

Twenty first Claim for Relief

412. Lack of Sufficient Knowledge to admit or deny the allegation.

413. Lack of Sufficient Knowledge to admit or deny the allegation.

414. Lack of Sufficient Knowledge to admit or deny the allegation.

415. Lack of Sufficient Knowledge to admit or deny the allegation.

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428. Lack of Sufficient Knowledge to admit or deny the allegation.

429. Lack of Sufficient Knowledge to admit or deny the allegation.

430. Lack of Sufficient Knowledge to admit or deny the allegation.

431. Lack of Sufficient Knowledge to admit or deny the allegation.

432. Lack of Sufficient Knowledge to admit or deny the allegation.

Twenty Second Claim for Relief

433. Deny all allegations

434. Deny all allegations

435. Deny all allegations

436. Lack of Sufficient Knowledge to admit or deny the allegation.

437. Deny all allegations

438. Deny all allegations

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439. Deny all allegations

440. Deny all allegations

441. Deny all allegations

442. Deny all allegations

443. Deny all allegations

444. Deny all allegations

445. Deny all allegations

446. Deny all allegations

447. Deny all allegations

448. Deny all allegations

449. Deny all allegations

450. Deny all allegations

451. Deny all allegations

B. Presenting Defenses to the Claims for Relief

Write a short and plain statement identifying the defenses to the claims, using one or more of the following alternatives that apply.

1. The court does not have subject-matter jurisdiction over the claims because *(briefly explain why there is no federal-question jurisdiction or diversity-of-citizenship jurisdiction; see the complaint form for more information)*

2. The court does not have personal jurisdiction over the defendant because *(briefly explain)*

3. The venue where the court is located is improper for this case because *(briefly explain)*

4. The defendant was served but the process-the form of the summons-was insufficient because *(briefly explain)*

5. The manner of serving the defendant with the summons and complaint was insufficient because *(briefly explain)*

6. The complaint fails to state a claim upon which relief can be granted because *(briefly explain why the facts alleged, even if true, are not enough to show the plaintiff's right to recover)*

7. Another party *(name)* _____ needs to be joined (added) in the case. The reason is *(briefly explain why joining another party is required)*

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

- a. If the basis for subject-matter jurisdiction is diversity of citizenship, state the effect of adding the other party:
- The other party is a citizen of the State of *(name)* _____.
- Or is a citizen of *(foreign nation)* _____. The amount of damages sought from this other party is *(specify the amount)* _____.
- b. If the claim by this other party is based on an alleged violation of a federal constitutional or statutory right, state the basis:
- _____

C. Asserting Affirmative Defenses to the Claims for Relief

Identify an affirmative defense or avoidance that provides a basis for the defendant to avoid liability for one or more of the plaintiff's claims even if the basis for the claim is met. Any affirmative defense or avoidance must be identified in the answer. Include any of the following that apply, as well as any others that may apply.

The plaintiff's claim for *(specify the claim)*

is barred by *(identify one or more of the following that apply)*:

1. Accord and satisfaction *(briefly explain)*
- _____

2. Arbitration and award *(briefly explain)*
- _____

3. Assumption of risk *(briefly explain)*
- _____

4. Contributory or comparative negligence of the plaintiff *(briefly explain)*
- _____

5. Duress *(briefly explain)*
- _____

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

6. **Estoppel** *(briefly explain)*

7. **Failure of consideration** *(briefly explain)*

8. **Fraud** *(briefly explain)*

9. **Illegality** *(briefly explain)*

10. **Injury by fellow employee** *(briefly explain)*

11. **Laches (Delay)** *(briefly explain)*

12. **License** *(briefly explain)*

13. **Payment** *(briefly explain)*

14. **Release** *(briefly explain)*

15. **Res judicata** *(briefly explain)*

16. Statute of frauds *(briefly explain)*

17. Statute of limitations *(briefly explain)*

18. Waiver *(briefly explain)*

19. Other *(briefly explain)*

D. Asserting Claims Against the Plaintiff (Counterclaim) or Against Another Defendant (Cross-Claim)

For either a counterclaim against the plaintiff or a cross-claim against another defendant, state briefly the facts showing why the defendant asserting the counterclaim or cross-claim is entitled to the damages or other relief sought. Do not make legal arguments. State how each opposing party was involved and what each did that caused the defendant harm or violated the defendant's rights, including the dates and places of that involvement or conduct. If more than one counterclaim or cross-claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. The defendant has the following claim against the plaintiff *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

2. The defendant has the following claim against one or more of the other defendants *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

3. State briefly and precisely what damages or other relief the party asserting a counterclaim or cross-claim asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons that are alleged to entitle the party to actual or punitive money damages.

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

- a. The defendant asserting the counterclaim or cross-claim against *(specify who the claim is against)* _____ alleges that the following injury or damages resulted *(specify)*:
- _____

- b. The defendant seeks the following damages or other relief *(specify)*:
- _____

III. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this answer: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the answer otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/04/23

Signature of Defendant

Printed Name of Defendant Patrick Pool

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

Telephone Number

707-515-8184

E-mail Address

ppool44@gmail.com

Justice Diversity
CENTER
OF THE BAR ASSOCIATION OF SAN FRANCISCO

CERTIFICATE OF SERVICE

You must serve each document you file by sending or delivering to the opposing side. Complete this form, and include it with the Answer that you file and serve.

1. **Case name** [write Plaintiff's name on the first line, and your name on the second line]:

California Coalition For Women Prisoners v. Officer Pool

2. **Case number:** 4:23-cv-04155

3. **Document served:** Answer [if you added a claim of your own, check the box for that claim]

☐ Counterclaim

☐ Crossclaim

4. **How was the Answer served?** [check one]

☒ Placed in U.S. Mail

☐ Hand-delivered

☐ Sent for delivery (e.g., FedEx, UPS)

☐ Sent by fax (if the other party has agreed to accept service by fax)

5. **To whom was the Answer sent?** [For each person you sent the document, write their full name and contact information used.]

Kara J. Janssen

6. **When was the Answer served?** October 4th, 2023

7. **Who served the Answer?** [Whoever puts it into the mail, faxes, delivers or sends for delivery should sign, and print their name and address. You can do this yourself.]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signature:

Patrick Pool

Name:

Patrick Pool

Address:

401 Winchester St

Vallejo Ca. 94590.

CERTIFICATE OF SERVICE [JDC TEMPLATE Rev. 2017]